

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Peter M. Galligan,	)	
	)	
Plaintiff	)	<b>Case No. 17-CV-6310</b>
	)	
v.	)	<b>Judge Lefkow</b>
	)	
Adtalem Global Education Inc., et al.	)	<b>Magistrate Judge Rowland</b>
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR [1] EXTENSION OF TIME TO RESPOND  
TO COMPLAINT AND [2] CONTINUANCE OF STATUS HEARING**

Defendants Adtalem Global Education Inc. (“ATGE”) and Adtalem Global Health, Inc. (“AGH”) (f/k/a DeVry Medical International, Inc. and so identified in the Complaint in this matter, *see* Dkt. No. 1) hereby move for an extension of time until November 20, 2017, to respond to the Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Defendants ATGE, AGH and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (“RUSVM”) (misidentified in the Complaint as “Ross University School of Veterinary Medicine,” *see* Dkt. No. 1) also hereby move for a continuance of the November 8, 2017, status hearing to the week of November 27, 2017.

Counsel for Defendants has communicated with counsel for Plaintiff regarding this motion, and counsel for Plaintiff has confirmed that Plaintiff does not oppose this motion. Defendants provide the following additional information in support of this motion:

1. The Complaint and an accompanying summons was properly served on Defendant ATGE through its registered agent on September 8, 2017, making Defendant ATGE’s response under Rule 12 due September 29, 2017.
2. On September 20, 2017, Defendants’ counsel spoke with Plaintiff’s counsel and sought Plaintiff’s position on an extension of time until November 20, 2017, for Defendant

ATGE to respond to the Complaint. Plaintiff's counsel stated that Plaintiff had no objection to such an extension.

3. To the knowledge of counsel for Defendants, the Complaint has not been served on Defendant AGH; however, during the aforementioned discussion on September 20, 2017, Plaintiff's counsel indicated that he believed the Complaint may have been served on Defendant AGH. In light of the uncertainty, the parties' counsel agreed that Defendant AGH would execute a waiver of service stating that Defendant AGH's response to the Complaint is due November 20, 2017, but that Defendant AGH also would file a motion with the Court, seeking an extension of time until November 20, 2017, to respond to the Complaint.

4. The Complaint has not been served on Defendant RUSVM. Counsel for Defendant RUSVM has executed a waiver of service, making Defendant RUSVM's response under Rule 12 due November 20, 2017.

5. For purposes of efficiency, Defendants desire that their responses to the Complaint be due on the same date, November 20, 2017, regardless of the service date.

6. The Complaint contains 12 claims for relief, 105 numbered paragraphs, and raises complex issues of law. Counsel for Defendants requires additional time to investigate the facts, analyze the legal issues, and prepare an appropriate response to the Complaint.

7. The Court has set an initial status hearing for November 8, 2017. On the assumption that Defendants will be filing their response to the Complaint on November 20, 2017, and given that the difference in timing would not be substantial, Defendants respectfully submit that it would be appropriate to continue the initial status hearing until the week of November 27, 2017. Further, lead counsel for Defendants expects to be in transit or already out of state on November 8, 2017, owing to an out-of-state matter set for arbitration later that week.

8. This motion is made in good faith and not for the purpose of delay.

**WHEREFORE**, Defendants respectfully request an order setting November 20, 2017, as the deadline for all Defendants' response to the Complaint pursuant to Rule 12 and an order continuing the initial status hearing to the week of November 27, 2017.

**Dated: September 27, 2017**

Respectfully submitted,

Adtalem Global Education Inc., et al.

By: /s/ Brian M. Stolzenbach  
One of Their Attorneys

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**CERTIFICATE OF SERVICE**

I, Brian M. Stolzenbach, an attorney, do hereby certify that I have caused a true and correct copy of the foregoing *Unopposed Motion For [1] Extension Of Time To Respond To Complaint And [2] Continuance Of Status Hearing* to be filed with the Court's ECF system on this 27th day of September, 2017, and caused the same to be served via the Court's ECF system to the following:

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/s/ Brian M. Stolzenbach  
Brian M. Stolzenbach